

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

FRERIC TRAVIS

**Complaint for Employment  
Discrimination**

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

Case No. 3:20-cv-5071-RK

*(to be filled in by the Clerk's Office)*

**-against-**

SONNY PERDUE

SECRETARY

DEPT. OF AGRICULTURE

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**REQUEST FOR TRIAL BY JURY**

Plaintiff requests trial by jury. ☒ Yes ☐ No

## I. The Parties to This Complaint

### A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Fredric Travis
Street Address	2430 Kentucky Ave
City and County	Joplin, Jasper
State and Zip Code	Missouri 64804
Telephone Number	417-658-6332
E-mail Address	dapeppaboy@yahoo.com

### B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

#### Defendant No. 1

Name	Sonny Perdue
Job or Title (if known)	Secretary
Street Address	1400 Independence Ave. SW Room 117
City and County	Washington
State and Zip Code	DC 20250
Telephone Number	202-720-8001
E-mail Address (if known)	

#### Defendant No. 2

Name	Department of Agriculture
Job or Title (if known)	Office of Adjudication
Street Address	1400 Independence Ave., SW MS9410
City and County	Washington

State and Zip Code DC 20250  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

**C. Place of Employment**

The address at which I sought employment or was employed by the defendant(s) is:

Name USDA FSIS  
Street Address 100 N. 6th St.  
City and County Minneapolis  
State and Zip Code MN 55403  
Telephone Number 612-659-7057

**II. Cause of Action**

This action is brought for discrimination in employment pursuant to (check all that apply):

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

*(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

*(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)*

- ☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

*(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

- ☒ Other federal law (*specify the federal law*):  
No Fear Act
- ☐ Missouri Human Rights Act, Missouri Revised Statute § 213.055
- ☐ Other state law (*specify, if known*):
- ☐ Relevant city or county law (*specify, if known*):

### III. Administrative Procedures

- A. Did you file a charge of discrimination against Defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

☒ Yes      Date filed: ~~2/22/2019~~ Many dates  
☐ No

*Attach copy of the charge to this Complaint*

- B. Have you received a Notice of Right-to-Sue Letter from the Equal Employment Opportunity Commission?

☐ Yes ☐ No

*If yes, please attach a copy of the letter to this Complaint.*

- C. Did you file a charge of discrimination against Defendant(s) with the Missouri Commission on Human Rights?

☐ Yes      Date filed: \_\_\_\_\_  
☒ No

*Attach copy of the charge to this Complaint*

- D. Have you received a Notice of Right-to-Sue Letter from the Missouri Human Rights Commission?

☐ Yes ☒ No

*If yes, please attach a copy of the letter to this Complaint.*



- E. If you are claiming **age discrimination**, check one of the following:
- ☐ 60 days or more have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.
- ☐ fewer than 60 days have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission

#### IV. Statement of Claim

- A. The discriminatory conduct of which I complain in this action includes (*check all that apply*):

- |                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | Failure to hire me.   |
| <input checked="" type="checkbox"/> | Termination of my employment.   |
| <input checked="" type="checkbox"/> | Failure to promote me.  |
| <input type="checkbox"/>            | Failure to accommodate my disability.                                   |
| <input checked="" type="checkbox"/> | Unequal terms and conditions of my employment.                          |
| <input checked="" type="checkbox"/> | Retaliation.  |
| <input checked="" type="checkbox"/> | Harassment/Hostile Work Environment                                     |
| <input checked="" type="checkbox"/> | Other acts ( <i>specify</i> ): <u>Degradation of name and character</u> |

*(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)*

- B. It is my best recollection that the alleged discriminatory acts occurred on the following date(s):

10/12/16 - 06/2020

- C. I believe that defendant(s) (*check one*):

- |                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | is/are still committing these acts against me.     |
| <input type="checkbox"/>            | is/are not still committing these acts against me. |

D. Defendant(s) discriminated against me based on my (check all that apply and explain):

<input checked="" type="checkbox"/>	race	African American
<input checked="" type="checkbox"/>	color	Black
<input type="checkbox"/>	gender/sex	
<input checked="" type="checkbox"/>	religion	Jehovah's Witness
<input type="checkbox"/>	national origin	
<input type="checkbox"/>	age. My year of birth is _____.	(Give your year of birth only if you are asserting a claim of age discrimination.)
<input checked="" type="checkbox"/>	disability or perceived disability (specify disability)	Torn hamstring

E. Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you?
- What injuries did you suffer?
- Who was involved in what happened to you?
- How were the defendants involved in what happened to you?
- Where did the events you have described take place?
- When did the events you have described take place?

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- 1.)Disciplined due to injury - was told i was being disciplined and wrote up for getting injured.
- 2.)Harassed and reprisal - was harassed by management for filing EEO complaint.
- 3.) Denial of Union - was denied Union representation while being harassed by management.
- 4.)Denial of promotion - was denied several promotions after I filed my first EEO complaint.
- 5.) Discrimination - was disciplined or denied my employee rights by management but coworkers of different race was allowed to exercise their rights or not disciplined for the same thing.
- 6.)Was questioned about my Whistleblower complaint.

- Was denied time off to go to work comp appointment by management*
- 7.) ~~Was denied time off to go to work comp appointment by management.~~
- Was forced to resign due to discrimination, reprisal, and harassment by Agency.*
- 8.) ~~Was forced to resign due to discrimination, reprisal, and harassment by Agency.~~
- Unfair or biased EEO investigations - didn't interview all of my witnesses or was one sided.*
- 9.) ~~Unfair or biased EEO investigations - didn't interview all of my witnesses or was one sided.~~

## V. Relief

As relief from the allegations of discrimination as stated above, Plaintiff prays that the court grant the following relief to Plaintiff: (check any and all that apply)

- ☐ Defendant be directed to employ Plaintiff
- ☒ Defendant be directed to re-employ Plaintiff
- ☒ Defendant be directed to promote Plaintiff
- ☒ Defendant be directed to reimburse for back pay for promotion
- ☒ Monetary damages (please explain): \_\_\_\_\_
- ☒ As additional relief to make Plaintiff whole, Plaintiff seeks (please specify and explain): \_\_\_\_\_

Pay attorney fees, damages for mental and emotional stress.

## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 8/2/, 2020.

Signature of Plaintiff

Printed Name of Plaintiff

Fredric Travis